

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W. R. GRACE & CO., <u>et al.</u>)	Case No. 01-01139 (JKF)
)	
Debtors.)	(Jointly Administered)

NOTICE OF RULE 30(b)(6) DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30(b)(6), and 45 of the Federal Rules of Civil Procedure, counsel for the above-captioned Debtors will take the deposition of the person employed by Byars Machine Co. who possesses the most knowledge of whether Byars Machine Co. (i) retained the law firm Speights & Runyan to represent Byars Machine Co. in the above-captioned bankruptcy cases; or (ii) authorized the law firm of Speights & Runyan to file a proof of claim on Byars Machine Co.'s behalf in the above-captioned bankruptcy cases.

The deposition will take place on July 7, 2005, at 2:00 p.m. at the offices of Byars Machine Co., 167 Byars Road, Laurens, South Carolina 29360 before a notary public or other officer duly authorized to administer oaths. The deposition shall continue on successive business days thereafter, as necessary, until completion. However, it is not expected that the depositions will take any significant time.

PLEASE TAKE FURTHER NOTICE that the deponent is requested to bring with him/her to the deposition the following documents (Please note that documents related to privileged attorney-client advice, if any, are not being requested):

1. Any and all documents reviewed by the deponent from the date of this Notice of Deposition to the date of the deposition, upon which the witness may rely for his or her testimony.

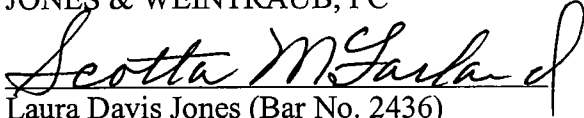
2. Any documents related to the retention of the law firm of Speights & Runyan for the purpose of filing a proof of claim or representing Byars Machine Co. in the above-captioned bankruptcy cases.
3. Any documents that support or otherwise relate to any proofs of claim that Byars Machine Co. filed in the above-captioned bankruptcy cases.
4. Any and all other documents upon which the witness will rely for her testimony.

Wilmington, Delaware

Dated: June 20, 2005

Respectfully submitted,
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